

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re:	)	Chapter 11
	)	
W.R. Grace & Co., et al.,	)	Case No. 01-01139 (JKF)
	)	(Jointly Administered)
Debtors.	)	
	)	

Hearing Date: August 25, 2003 @ 12:00 p.m.  
Response Due: August 8, 2003

**RESPONSE TO DEBTORS' SECOND OMNIBUS OBJECTION TO CLAIMS (NON SUBSTANTIVE)**  
**AND MOTION FOR ADDITIONAL TIME**

NOW COMES, Dr. John Robert Davis, claim number 10579, by and through his attorney and files this his Response to Debtors' Second Omnibus Objection to Claims (Non Substantive) and Motion for Additional Time, and in support thereof, would show:

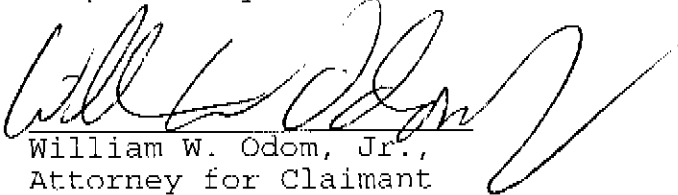
1. This Court has jurisdiction over this Matter.
2. Claimant filed claim before the claims bar date of March 31, 2003.
3. Claimant included documentation supporting the existence of asbestos in the ceiling tile.
4. Claimants attorney did not receive a complete copy of Objection with all attached Exhibits until August 7, 2003, the day before the Response was due.
5. Due to the time lapse since the installation of the ceiling tile, documentation is no longer readily available and claimant is looking for documentation and will supply it as soon as possible.
6. Dr. Davis has reason to believe that W.R. Grace & Co., et al, manufactured parts or all of ceiling tile.
7. Claimant ask that the court grant claimant an additional week to file response and supporting documents, due to receiving complete objection the day before response was due.

8. Claimant is asking for sufficient funds to have the ceiling removed and replaced.

WHEREFORE, Claimant respectfully request that the Court enter an order allowing claimant an additional week to recover supporting documents and denying that part of the Debtors' Second Omnibus Objection pertaining to Claimant.

Witness my hand this the 7<sup>th</sup> day of August, 2003.

Respectfully Submitted,



William W. Odom, Jr.,  
Attorney for Claimant

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CERTIFICATE OF SERVICE

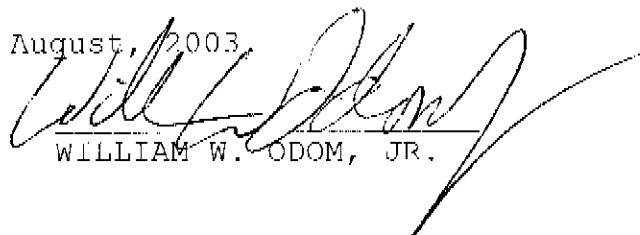
I, the undersigned attorney do hereby certify that I have this day served a true and correct copy of the foregoing Response to Debtors' Second Omnibus Objection to Claims (Non Substantive) and Motion for Additional Time, by UPS overnight delivery to the following at their regular business mailing address being:

James W. Kapp III, Janet S. Baer, & Christian Lane  
Kirkland & Ellis LLP  
200 E. Randolph Drive  
Chicago, IL 60601

&

Scotta E. McFarland  
Pachulski, Stang, Ziehl, Young, Jones & Weintraub P.C.  
919 North Market Street, 16<sup>th</sup> Floor  
Wilmington, DE 19801

This the 7<sup>th</sup> day of August, 2003.

  
WILLIAM W. ODOM, JR.

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